California Regional Water Quality Control Board
North Coast Region
Bob Anderson, Chairman

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Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

September 2, 2008

Michael Callihan
Humboldt Creamery
572 Highway 1
Fortuna, CA 95540

Dear Mr. Callihan:

Subject: Response to Comments, National Pollution Discharge Elimination System Permit Tentative Board Order R1-2008-0020

File: Humboldt Creamery Association, Fernbridge, WDID No. 1B80185OHUM

On August 14, 2008, the North Coast Regional Water Quality Control Board (Regional Water Board) staff received your permit comments contained in *Humboldt Creamery – Fernbridge Facility, NPDES Permit Renewal Response to Comments and Permit Redline*. The August 14 comments requested that the Regional Water Board consider several issues during the renewal of your National Pollution Discharge Elimination System Permit (NPDES permit). Your requests for permit modification are presented in italics below, followed by the Regional Water Board staff's response.

Item 1. Table 4: Facility Information

The facility design flow at SN-002 (condensate and non-contact cooling water) discharged to the Eel River is listed at 63,000-gallons per day (gpd), which was the previous average. SHN is not sure where this design number came from; however, the actual gallons per day (metered between December 2007 and June 2008) was 110,000 gpd. SHN is proposing that the previous design flow be increased to the current or estimated future flow rates.

A change in the permitted flow from EFF-002 (formerly SN-002) over the volume allowed in accordance with provisions of the previous permit would effectively result in a less stringent requirement than the previous permit because it would allow for increased mass discharges from the creamery. Clean Water Act section 402(o) prohibits reissuing or modifying a permit to include effluent limitations less stringent than those in the previous permit, unless certain exceptions are met. (See also 40 Code of Federal

Regulations (CFR) § 122.44(l) .)[1] This is commonly known as the antibacksliding rule. For water-quality-based effluent limitations, there are several exceptions to the antibacksliding rule – one in Clean Water Act section 303(d)(4) and the other in section 402(o)(2). None of the information that would be necessary to justify increasing the permitted flow, and meet the criteria of either 303(d)(4) or 402(o)(2), has been provided.

Although increased discharges to land would not be subject to anti-backsliding requirements, it would, nonetheless, be subject to the State's antidegradation policy, State Water Resources Control Board Resolution 68-16. This policy requires that:

> Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in the best practicable treatment or control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the state will be maintained.

Without adequate information to conduct this analysis, no increase in discharges to land could be provided. In the future, if the Humboldt Creamery provides technical information in order to justify an increase in the discharge rate and pollutant load, the Permit can be modified to authorize this change.

Item 2. Section III. H: Discharge Prohibitions
Clarify this first sentence to read; "During the period of October 1 through May 14, discharges of wastewater shall not exceed one percent of the flow of the receiving water as measured in the Eel River at the Scotia gauging station (USGS Station 11477000). The total volume discharged to the Eel River in a calendar month shall not exceed, in any circumstances, one percent of the total volume of the Eel River passing the Scotia gauging station in the same calendar month.

This suggested change was incorporated into the draft Order.

Item 3. Section IV: Effluent Limitations and Discharge Specifications
SHN suggests that wording be included, under the Final Effluent Limitations – Discharge Point SN-002, to clarify that if no discharge occurs to the Eel River from SN-002, then sampling will not be required during that specific monitoring period.

A modification to the monitoring and reporting program specifies that sampling and analysis from EFF-002 will only be required during periods of discharge from that location.

[1] All further statutory references are to title 40 of the Code of Federal Regulations unless otherwise indicated.

Item 4. Table 7: Land Discharge Effluent Limitations
The facility well water has reportable manganese concentrations, and the land discharge effluent limits should not be set any lower than the naturally occurring background levels; therefore, we suggest including an asterisk behind the 200(*), indicating that the proposed effluent limit take into consideration that manganese background concentrations exist in the well water, and that any limits be set at or above the existing background concentration. Background concentrations should also be determined for the other constituents of concern, and new proposed limits should not be lower than existing background concentrations.

Regional Water Board staff recognize that manganese commonly occurs naturally in groundwater. The draft Order will be modified and the effluent limitation for this constituent removed. Groundwater, receiving water limitations will be maintained for the protection of beneficial uses, but will in no case be more stringent than background groundwater quality as measured in the background monitoring well. Both effluent and groundwater monitoring for manganese will be maintained in order to evaluate the need to implement a manganese effluent limitation in the future.

Item 5. Section VI: C. Special Provisions. 1(e) Special Studies
Please note that a special mixing study was completed and submitted with the permit application (SHN, September 28, 2006). Additionally, a septic and leachfield study was completed (SHN, September 2006), and based upon recommendations the tanks were cleaned and sealed from groundwater infiltration, and the leachfield systems were hydro-flushed.

Documentation supporting these facts is contained in the file record. Therefore, no change to the draft Order is necessary.

Item 6. Section VI: C.6(b) Storm Water
To the extent Humboldt Creamery obtains coverage under the State Water Board's General Industrial Storm Water Permit, discharges of non-contact cooling water and condensate from the dry condensed milk manufacturing process may be appropriately permitted as authorized non-storm water discharges.

Non-contact cooling water and wastewater from the condensed milk process would not be appropriate for coverage under the storm water permit. The storm water permit does recognize several categories of "incidental runoff" that may occur at industrial sites. These discharges are low volume, low threat and occur infrequently. The discharges of condensate and cooling water at this facility cannot be defined as "incidental runoff". Discharges of wastewater from the condensed milk sub-category are regulated in accordance with the effluent guidelines under section 405, title 40, which supersedes any other requirements that may be considered. Similarly, the General Industrial Storm Water Permit specifically identifies non-contact cooling water as an example of a prohibited non-storm water discharge.

Item 7. Section VI: C.7 Compliance Schedules
As discussed, to the extent the permit must be adopted in September, we believe it is imperative that compliance schedules be incorporated into the permit as allowed by State Water Resources Control Board Resolution No. 2008-0025.

The Humboldt Creamery is requesting to have a compliance schedule only for those sections of the permit governing land discharges. Water Code section 13263(c) permits waste discharge requirements to contain a time schedule to allow dischargers time to come into compliance. Staff has considered the request to include a compliance schedule for newly imposed sodium effluent limitations for LND-001. Based upon the limited information available in our file records, as well as technical information provided in the August 14 comment response, we have modified draft Order R1-2008-0020 to include a compliance schedule to meet LND-001 effluent limitations for sodium and total dissolved solids. The compliance schedule, contained in section VI.C.2.d. of the Order, requires interim tasks and final compliance with sodium and total dissolved solids limitations at LND-001 no later than December 1, 2010. During the interim period any increase or additional waste to the existing waste stream shall be prohibited. No compliance schedule has been requested to meet NPDES limits for discharges to the Eel River.

Item 8. Attachment E - Monitoring and Reporting Program (MRP)
Table E-1, Monitoring Locations, describes each monitoring location; however, we are recommending that up to five (5) new permanent monitoring wells be installed. Four (4) of the wells will be used for collecting samples for analysis to determine impact from the waste discharge to land, and the fifth well should be used for statistical comparison and determining background concentration limits. Additionally, all wells will be used for obtaining groundwater elevations. Locations and depths of the wells need to be determined based upon the previous special study, which utilized the temporary wells. The proposed permit should have a specified time schedule that will allow the permitting and installation of wells to occur.

Draft Order R1-2008-0020 Table E-1, Monitoring Locations footnote 7 referring to each of the groundwater monitoring well locations states, “This monitoring location refers to the numerically similar groundwater monitoring location previously sampled for data submitted in conjunction with the report of waste discharge. Alternative permanent monitoring locations may be substituted upon approval of the Executive Officer.” Provision IV.C.2.b.i of draft Order R1-2008-0020 requires submittal of a workplan by February 1, 2009 for a disposal study to determine the appropriate salt, nutrient, and irrigation management practices. Among other things, the workplan proposal must investigate site specific lithology, soil transmissivity, and depth to groundwater across seasonal variations. In order to collect the necessary data required for the disposal study, Humboldt Creamery may propose installation of permanent monitoring wells. Alternatively, a separate workplan for monitoring well installation could be submitted for Executive Officer approval. Until permanent monitoring wells are installed, Humboldt Creamery should collect the required sample data from the existing temporary wells.

Item 9. Attachment E – Section IV, Effluent Monitoring Requirements, (A) Monitoring Location EFF-002

SHN suggests changing the first sentence to read, "When discharging to the Eel River at EFF-002 (SN-002), the Discharger shall monitor Effluent, from the non-contact cooling water and evaporative condensate processes, at EFF-002 as follows..."

Table E-3 Effluent Monitoring Location EFF-002, indicates that daily flow readings will need to be recorded, and that weekly BOD, TSS, and pH samples need to be collected for analysis utilizing a 24-hour composite sampler. Additionally, acute toxicity analysis will be required twice annually, chronic toxicity analysis will be required annually, and CTR testing will be completed once during the life of the permit (every 5-years).

The draft permit should be revised to provide that if EFF-002 is not discharging to the Eel River, then sampling will not be required at SN-002, SWR-001, SWR-002 during that specific reporting period. Analyzing for acute and chronic toxicity, and the CTR testing will be required when discharging to the river during that specific monitoring and reporting period. In addition to monitoring and sampling at EFF-002, when discharging to the river, the receiving water upstream and downstream of the facility will also require sampling and monitoring. If required to monitor and sample at these locations, the analytical costs could be very expensive, unless this discharge to the river is used only minimally or not at all. Please note that Humboldt Creamery still wishes to keep this NPDES discharge point in the permit active, but anticipates that sampling at these locations will be minimal.

Attachment E of draft Order R1-2008-0020 has been modified as follows:

> IV.A.1: When discharging to the Eel River, the Discharger shall monitor Effluent from non-contact cooling water and evaporative condensate processes at EFF-002 as follows.
>
> Footnote 11: When not discharging to the Eel River, sampling will not be required at EFF-002, SWR-001, SWR-002 during that specific reporting period. In order to ensure adequate characterization of the discharge, all sample analyses required in a given period (i.e. weekly and annual frequency) shall be collected if discharge occurs during that period.

Item 10. Attachment E – Section VI, Land Discharge Monitoring Requirements (A) Monitoring Location LND-001

Table E-4 indicates that monthly (24-hour) composite samples are to be collected for analysis at discharge point LND-001 (discharge from the treatment pond). To reduce sampling costs, SHN is recommending that monthly samples be collected for analysis during the first year of the permit (2009), and then quarterly monitoring and sampling be initiated beginning in 2010. Please note that the groundwater samples are required to

be collected only quarterly to evaluate the potential impacts from the land irrigation system.

The permit currently requires monthly monitoring. No change will be made to the Order at this time; however, Humboldt Creamery may submit a request for modification of the monitoring and reporting program at any time during the permit term. If after the first year of monitoring, Humboldt Creamery believes that the data indicates that monthly sampling is not required, a request for modification of the permit may be made. Any modification proposal received will be evaluated based upon the data available at that time. Should modification of the monitoring and reporting requirements be deemed appropriate, a revised monitoring and reporting program would be adopted.

Item 11. Attachment E – Section VIII, Receiving Water Monitoring Requirements – Surface Water and Groundwater, (A) Monitoring Location SWR-001
Table E-5 shows the proposed up-stream Eel River receiving water monitoring sample frequency and constituents of concern. As noted above, the draft permit should be clarified to require that SWR-001 will only be sampled when discharging to the river at SN-002 (EFF-002) during that specific monitoring and reporting period. Additionally, we recommend that Ammonia Nitrogen, Nitrate Nitrogen, Sodium, and Manganese be removed from the constituent list, since the groundwater monitoring wells will be sampled quarterly to evaluate the receiving water impacts of these constituents.

Modifications to draft Order R1-2008-0020 have been made consistent with these requests.

Item 12. Attachment E – Section VIII, Receiving Water Monitoring Requirements – Surface Water and Groundwater, (B) Monitoring Location SWR-002
Table E-6 shows the required downstream Eel River receiving water monitoring sample frequency and constituents of concern. As noted above, the down stream receiving waters should only be sampled when discharging to the river at SN-002 (EFF-002) during that specific monitoring and reporting period. In addition, the permit needs to clarify that SWR-001 is the upstream sampling location; SWR-002 is the sampling location downstream of EFF-002; and the facility downstream sampling location is SWR-003, which is located downstream of the waste discharge to land area.

Table E-1. Monitoring Station Locations contains the following information:

Receiving Water	SWR-001	Eel River surface water upstream of the Humboldt Creamery Facility, beyond influence of any discharge
Receiving Water	SWR-002	Eel River surface water at the point of EFF-002 discharge or other approved location

As indicated under item #9 above, surface water receiving water sampling will be required only during periods of discharge from EFF-002. All references to receiving water location SWR-003 have been removed from the draft Order.

Item 13. Attachment E – Section VIII, Receiving Water Monitoring Requirements – Surface Water and Groundwater, (C) Monitoring Location GWR-001 Through GWR-005

Table E-7 shows the Receiving Water Monitoring Requirements for GWR-001 through GWR-005. SHN is recommending that five new 2-inch diameter monitoring wells be installed, with the proper surface seals, and that the wells be installed deeper into the aquifer. Also, only four (4) monitoring wells should be sampled quarterly for analysis, and the fifth well be used for determining background concentrations. Once background concentrations have been determined then this fifth well may not need sampling on a quarterly basis; therefore we recommend sampling GWR-005 quarterly for the first year, and then annually thereafter. All monitoring wells will be monitored for depth to groundwater on a quarterly basis.

As indicated in #8, above, draft Order R1-2008-0020 already allows for the installation of new permanent wells. In regards to the request to reduce sampling at GWR-005, no change to the draft Order will be made at this time. Humboldt Creamery may, however, submit a request for modification of the monitoring and reporting program at any time during the permit term. Any modification proposal received will be evaluated based upon the data available at that time. Should modification of the monitoring and reporting requirements be deemed appropriate, a revised monitoring and reporting program would be adopted.

Item 14. Attachment E – Section IX, Other Monitoring Requirements – (A) Monitoring Locations INT-North, INT South, GWR-North, and GWR-South.

Table E-8 indicates that depth to groundwater measurements will be collected on a quarterly basis from these existing wells, which were previously installed to measure function of the facility's leachfield trench distribution system. SHN is recommending that these well be evaluated, and if they are to remain then the top of casings be surveyed to the same datum as the new proposed wells top of casing.

This item does not necessitate any modifications to draft Order R1-2008-0020, as described in #8.

Item 15. Attachment E – Section X, Reporting Requirements - (D) Other Reports, (2) Annual Report

The proposed permit requires that annual reports be submitted by March 1 of the following year. Since this permit will not go into effect until December of 2008, the first annual report will need to be submitted by March 1, 2009. SHN is recommending that the effective date of the permit going into effect be changed to January 1, 2009, and that the annual report be due by March 1 of 2010.

The effective date of Order R1-2008-0020 will remain December 1, 2008. However, Section X of Attachment E has been modified to require the first annual monitoring

report, including December 2008 and January through December 2009, to be submitted by March 1, 2010.

Item 16. Attachment F – Section I, Permit Information
Table 1. Facility Information has the WDID wrong, and should read 1B80185OHUM

Modification to draft Order R1-2008-0020 has been made to correct this typographical error.

Item 17. Attachment F – Section II, Facility Description (B) Discharge Points and Receiving Waters
The first paragraph indicates that between October 1st and May 15th of each year, condensate from the dry condensed milk manufacturing process and non-contact cooling water is discharged directly from the Facility Discharge point SN-002 to the Eel River, a water of the United States, within the Ferndale hydrologic subarea of the Eel River watershed.

Humboldt Creamery wishes to keep this NPDES discharge to the Eel River active; however, we are suggesting that this paragraph read as follows; "During the period between October 1st and May 15th of each year the condensate from the dry condensed milk manufacturing process and non-contact cooling water will either be discharged to the Eel River at SN-002 or to the southern fields or to the treatment pond. Between May 16th and September 30th of each year, the condensate from the dry condensed milk manufacturing process and non-contact cooling water will be either treated with the rest of the process waste water generated at the Facility or discharged to the southern fields."

Modifications to Attachment F of draft Order R1-2008-0020 to reflect the following:

> Between October 1st and May 15th each year, condensate from the dry condensed milk manufacturing process and non-contact cooling water may be discharged directly from the Facility at Discharge point SN002 to the Eel River, a water of the United States, within Ferndale hydrologic subarea of the Eel River watershed. Alternatively, the condensate from the dry condensed milk and non-contact cooling water will be treated with the rest of the process wastewater generated at the Facility. The treated process wastewater is discharged from Discharge Point SN001 via irrigation to approximately 150 acres of grazed pasture land adjacent to the facility and bordering the Eel River.

Further modification to the method of treatment and point of discharge such as suggested in comment #17 (splitting flows to the south field) would require alteration to the report of waste discharge and additional sampling requirements. Such a modification may be considered in a subsequent permitting cycle.

Item 18. Attachment F – Section II, Facility Description (D) Compliance Summary

This section states "Discharger has demonstrated overall compliance with conditions of Order No. R1-002-0041; however, monitoring data shows that the Discharger has exceeded permit criterion for flow at both SN-001 and SN-002. Based upon the available file information, it is unclear how the design flow criteria were developed. Section VI.C.2.c of this Order requires a special study to evaluate appropriate design criteria applicable to the Humboldt Creamery facility."

The time schedule proposed in the permit appears to be appropriate; however, the work scope required to study and evaluate the waste streams could be significant. SHN believes that while the technical information is important, the actual loading rates and treatment system capabilities will best be determined by actual field data and test results. It is critical that this work scope be better defined prior to the permit being approved.

As indicated in the Fact Sheet, Section VI.C.2.c of Order R1-2008-0020 requires a special study to evaluate applicable design parameters for the facility. The purpose of the study is to reveal the hydraulic and biological treatment capabilities of the facility. The workplan scope is left intentionally broad to allow best professional judgment of Humboldt Creamery and its representatives in developing a proposed scope of work as necessary to achieve the desired outcome. No change to the draft Order or Fact sheet is necessary to accommodate collection of field data during the special study.

Item 19. Attachment F – Section III, Applicable Plans, Policies, and Regulations, (E) Other Plans, Policies and Regulations, (1) Stormwater

The Order requires the Discharger to seek authorization to discharge under and meet requirements of the State Water Board's Water Quality Order 97-03-DWQ, NPDES General Permit No. CAS000001, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities, Excluding Construction Activities, if applicable.

To the extent Humboldt Creamery has obtained coverage under the General Industrial Storm Water Permit before adoption of the Tentative Order (as we expect), SHN is recommending that the permit indicate that this facility has such coverage.

The statewide storm water industrial discharger's database does not indicate Humboldt Creamery's enrollment in the program as of the date of this writing. Therefore the draft Order has not been modified.

Item 20. Attachment F – Section IV, Rational for Effluent Limitations and Discharge Specifications, (F) Land Discharge Specifications, (3) Determining the Need for WQBELs.

The effluent limitations on LND-001 are for the protection of drinking water and agricultural water supply; however, there are cows grazing on the fields where the groundwater monitoring wells are installed. Therefore, there is some concern there may

be additional impacts to groundwater from the grazing activities taking place within the land discharge areas.

Sodium has an effluent limitation established at 60,000 mg/L, which is based upon the secondary maximum contaminant level (MCL) for taste and odor; however, sodium hydroxide is used in the cleaning and disinfectant process, which could cause this limit to be exceeded. Evaluating the need for changing to a cleaning solution that does not contain sodium may be necessary; however, these changes may be costly and could impact creamery production. SHN recommends that an interim limit be set, until compliance can be achieved.

Manganese has an effluent limitation of 200 ug/L, which is based on water quality objectives for the protection of agricultural supply; however, manganese is present in the groundwater that is pumped from the on-site wells (over 100-foot deep). SHN is recommending that the water quality limits be set at or above background levels.

Additionally, SHN is recommending that the water quality limits be set at or above background levels for other constituents of concern.

Item #4 above addresses Humboldt Creamery's concerns regarding manganese. The draft Order will be modified and the effluent limitation for manganese removed. In addition, a compliance schedule, as mentioned in item #7 above, will be included in section VI.C.2.d. of the draft Order requiring interim tasks and delayed final compliance with sodium and total dissolved solids limitations at LND-001.

As indicated in the Fact Sheet of draft Order R1-2008-0020, Regional Water Board staff used the water quality objectives for protection of the beneficial uses of groundwater in establishing the effluent limitations for LND-001. These limitations have been established at the maximum level allowable while still protecting beneficial uses of state water. However, as indicated in section 13263 of the Porter-Cologne Water Quality Control Act, the Regional Water Board need not authorize utilization of the full assimilative capacity of the receiving waters when establishing effluent limitations. Therefore, should data gathered during receiving water monitoring and or special studies conducted during this permit cycle indicate a portion of the assimilative capacity is being used due to sources other than the Humboldt Creamery (such as cattle grazing), adjustments to discharge specifications may be necessary. Any adjustments determined necessary for effluent limitations from LND-001 would likely necessitate a lowering of allowable pollutant discharge.

Item 21. Attachment F – Section VII, Rational for Provisions, (C) Special Provisions, (2) Special Studies and Additional Monitoring Requirements, (b) Land Disposal Evaluation.

As indicated in the draft permit, "This Order allows for year round disposal of wastewater. These discharges are prohibited from creating a condition of pollution or nuisance, adversely impacting the beneficial uses of water, or statistically changing

groundwater conditions. In order to ensure compliance with applicable regulations, some facilities may need to implement modifications. It is appropriate to provide a reasonable time schedule for the proper evaluation of potential discharges, possible alternatives, and implementation for any necessary modifications. "

Based upon this statement and current Water Board policy, SHN suggests that compliance schedules are appropriate and should be incorporated into the permit.

A compliance schedule has been incorporated into the tentative Order to address sodium and total dissolved solids limitations. In addition, the special study required under section VI.C.2.b of the Order provides for a schedule to evaluate land discharges and make adjustments to management practices, where needed to comply with effluent and receiving water requirements. During review of this section of the fact sheet, a typographical error was identified. The second sentence in the paragraph has been modified to correctly reflect the requirements as follows:

> These discharges are prohibited from creating a condition of pollution or nuisance, or adversely impacting the beneficial uses of water.

Item 22. Attachment F – Section VII, Rational for Provisions, (C) Special Provisions, (2) Special Studies and Additional Monitoring Requirements, (c) Effluent Disposal Evaluation.

As indicated in the draft permit, "This Order limits wastewater disposal above previously permitted effluent design flows. It is unclear from the file record how these design flows were developed and whether they are the most appropriate design flows for the current facility conditions. Any increase in permitted flows would require appropriate anti-degradation analyses. In order to ensure compliance with applicable regulations, some facilities may need to implement modifications. It is appropriate to provide a reasonable time schedule for the proper evaluation of potential discharges, possible alternatives, and implementation for any necessary modifications."

Based upon this statement and current Water Board policy, SHN suggests that compliance schedules are appropriate and should be incorporated into the permit.

As indicated in #1 response, above, no changes will be made to the design flows in this draft Order. In regards to a compliance schedule for the land discharge, this has been addressed in conjunction with #7 response, above.

Conclusion

Humboldt Creamery appreciates the obvious effort that has gone into the draft permit. However, because it is significantly more complex and potentially much more burdensome than the current permit, Humboldt Creamery needs more time to evaluate what steps may be needed to comply with the permit once adopted. Accordingly, our strong preference would be postpone adoption of the permit until this initial evaluation is completed in three to four months. If the Board feels the permit must be adopted at the

September 2008 hearing, it is imperative that the permit be revised to incorporate the time and flexibility necessary to achieve the permit's objectives.

Regional Water Board staff can appreciate the complexities of the updated draft permit as well as the need for Humboldt Creamery to conduct evaluations and implement potential changes to comply with the requirements in draft Order R1-2008-0020. The limitations in draft Order R1-2008-0020 have been set for the protection of water quality. The concerns Humboldt Creamery has expressed in not being able to meet the new effluent limitations, however, do not involve effluent limitations for surface water discharges, and therefore would not result in mandatory minimum penalties, should full compliance not be achieved immediately. As with any discharger, Humboldt Creamery's efforts towards identifying and resolving non-compliance would be taken into consideration, should discretionary violations of permit conditions be assessed. To alleviate the potential for likely compliance difficulties, a time schedule has been incorporated into the draft Order as requested. The time schedule will allow Humboldt Creamery a year to achieve effluent limitations for sodium and total dissolved solids at LND-001. We will be happy to work with Humboldt Creamery staff as well as your consultants to resolve any compliance issues.

Please note that in addition to modifications to draft Order R1-2008-0020 made in response to questions or concerns identified above, Regional Water Board staff made changes to various sections of the permit to correct typographical errors or provide further clarification in a manner not considered to result in substantial modification. Each change to the draft Order can be identified in the enclosed copy of the final draft by underline and strikeout characteristics.

I am always happy to coordinate with you or your representative to clarify questions or concerns. Please do not hesitate to contact me at lbernard@waterboards.ca.gov or (707) 576-2677, if I can assist you in any way.

Sincerely,

Lisa Bernard
Sanitary Engineering Associate

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Return Receipt Requested

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